

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

APRIL BOREN, individually on behalf of  
herself, and all others similarly situated,

Plaintiffs,

-against-

SAFEWAY, INC.,

Defendants.

Case No. 2:25-cv-00182-MJP

STIPULATION AND ~~PROPOSED~~ ORDER  
MODIFYING BRIEFING SCHEDULE ON  
PLAINTIFF’S MOTION FOR CONDITIONAL  
CERTIFICATION OF PROPOSED  
COLLECTIVE ACTION

**STIPULATION AND ~~PROPOSED~~ ORDER MODIFYING BRIEFING SCHEDULE  
ON PLAINTIFF’S MOTION FOR CONDITIONAL CERTIFICATION**

COME NOW Plaintiff APRIL BOREN, individually on behalf of herself, and all others  
similarly situated (“Plaintiff”) and Defendant SAFEWAY INC. (“Defendant”), erroneously sued  
herein as Safeway, Inc., hereby enter into the following stipulation based upon the following facts:

1. WHEREAS, on April 8, 2025, the Parties held a meet and confer conference as required  
by Rule 26(f) and this Court’s March 12, 2025 Order [Dkt. No. 17]. During that conference, the Parties  
discussed Plaintiff’s anticipated Motion for Conditional Certification of her Proposed Collective  
Action. Furthermore, during that conference, lead trial counsel for Defendant, Mara Curtis, relayed

that she was unavailable for a preplanned vacation from June 19, 2025 through July 4, 2025, and requested that any briefing schedule associated with Plaintiff's anticipated Motion for Conditional Certification account for this preplanned vacation. This statement was included within the Parties' Joint Status Report and Discovery Plan filed with the Court on April 23, 2025 [Dkt. No. 24];

2. WHEREAS, on April 9, 2025, Defendant issued deposition notices to Plaintiff April Boren and opt-in Plaintiffs Cassandra McMillen, Christina Blaylock, and Marcy Robinson, which are currently scheduled for July 22, 2025, July 23, 2025, July 24, 2025, and July 25, 2025, respectively;

3. WHEREAS, the Parties, through their meet and confer efforts, previously agreed to the following briefing schedule on Plaintiff's anticipated Motion for Conditional Certification and the Court issued an Order setting this schedule: (1) July 17, 2025 – deadline for Plaintiff to file Motion for Conditional Certification; (2) August 18, 2025 – deadline for Defendant to file Opposition to Plaintiff's Motion for Conditional Certification; and (3) September 2, 2025 – deadline for Plaintiff to file her Reply Brief in Support of Motion for Conditional Certification [Dkt. No. 31 and 32];

4. WHEREAS, through further meet and confer efforts regarding the above depositions, the Parties have agreed to now hold Plaintiff April Boren's deposition on August 11, 2025 and opt-in Plaintiff Cassandra McMillen's deposition on August 12, 2025. The Parties continue to meet and confer regarding the depositions of opt-in Plaintiffs Christina Blaylock and Marcy Robinson;

5. WHEREAS, the Parties have agreed to extend the entire briefing schedule on Plaintiff's anticipated Motion for Conditional Certification by one week to account for the aforementioned modification of deposition dates, and further agree to a new modified briefing schedule as follows: (1) July 24, 2025 – deadline for Plaintiff to file Motion for Conditional Certification; (2) August 25, 2025 – deadline for Defendant to file Opposition to Plaintiff's Motion for Conditional Certification; and (3) September 9, 2025 – deadline for Plaintiff to file her Reply Brief in Support of Motion for Conditional Certification;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the Parties, subject to the approval of the Court, as follows:

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- 1 1. Plaintiff's Motion for Conditional Certification of her Proposed Collective Action is now
- 2 due to the Court no later than July 24, 2025;
- 3 2. Defendant's Opposition to Plaintiff's Motion for Conditional Certification of her Proposed
- 4 Collective Action is now due to the Court no later than August 25, 2025; and
- 5 3. Plaintiff's Reply Brief in Support of Plaintiff's Motion for Conditional Certification of her
- 6 Proposed Collective Action is now due to the Court no later than September 9, 2025.
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8 **IT IS SO ORDERED.**

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10 Dated this 11th day of July, 2025.

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12 Marsha J. Pechman  
13 United States Senior District Judge  
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REED SMITH LLP  
A limited liability partnership formed in the State of Delaware

Dated: July 11, 2025

/s/ Kim De Arcangelis

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Dated: July 11, 2025

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REED SMITH LLP  
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1 Dated: July 11, 2025

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15 *SAFEWAY, INC.)*